



*United States Attorney
Southern District of New York*

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One Saint Andrew's Plaza
New York, New York 10007*

November 28, 2022

BY ECF and HAND DELIVERY

The Honorable Louis L. Stanton
United States District Judge
500 Pearl Street
New York, New York 10007

Re: Securities and Exchange Commission v. Gregoire Tournant,
22 Civ. 4016 (LLS)

Dear Judge Stanton:

The Government respectfully submits this letter requesting the Court set a full briefing schedule for the Government’s motion to intervene and stay the above-captioned case. On November 14, 2022, the Government submitted a pre-motion letter (Dkt. 28) pursuant to the Court’s Individual Rules of Practice in Civil Cases indicating its intention to move to intervene and stay discovery in this action and requesting a pre-motion conference. On November 16, 2022, the SEC filed a short response to the Government’s letter (Dkt. 29), and on November 18, 2022 defendant Gregoire Tournant likewise filed a response (Dkt. 30).

In light of these responses, the Government respectfully requests the Court set a full briefing schedule so that the issues may be comprehensively addressed. The Government respectfully proposes a deadline of December 16, 2022 for the motion; January 20, 2023 for opposition; and February 10, 2023 for any reply. The SEC does not object. Tournant objects to setting a briefing schedule at this time and prefers to proceed to a pre-motion conference.

Respectfully submitted,

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cc: All Counsel (by ECF)